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Katherine Peterson

UNITED STATES OF AMERICA,

- vs -

KATHERINE PETERSON,
Defendant.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Criminal No. 22-621 (MAS)

**DEFENDANT'S NOTICE
OF OBJECTION TO AUTHENTICITY**

PLEASE TAKE NOTICE that Defendant Katherine Peterson, through her attorneys, Hartmann Doherty Rosa Berman & Bulbulia LLP (Mark A. Berman, Esq., appearing), objects to the authenticity of the following pre-marked government exhibits:

GX162: Appears to be a demonstrative photograph of Lidocaine prescription rates. The government indicates that it is part of “PBM Documents and Data” but there is no indication of who created the photograph, what it represents, or the data underlying it.

GX163: *Id.*

GX278: Appears to be a photograph of Lidocained Ointment boxes prescribed to an individual. The government describes this exhibit as part of “Search Warrant Materials” but it does not appear to be a business record and is otherwise unidentified.

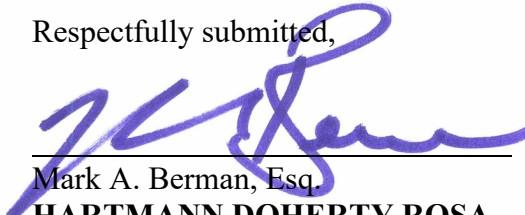
GX280: Appears to be a document redlined by Steven King. The government describes this exhibit as “Compound Incentive Program” and as part of “Search Warrant Materials.” If this document came from the company’s records then there is no objection to authenticity. If the document did not come from the company’s records then its authenticity is unclear.

GX293: Appears to be notes received by the government from James Letko (based on the bates stamp) and described by the government as "Bonus Summary." It is not clear how the government obtained this document (the government does not describe it as part of the business records seized pursuant to search warrant) and if it was not seized with other business records then its authenticity is subject to question.

FOR PURPOSES OF CLARITY: Defendant does not object to the authenticity of Medicare documents and data, documents received by the government from financial institutions or from PBM's, corporate filings, or to actual business records seized by the government as a result of its execution of a search warrant. Defendant reserves the right to otherwise object to such exhibits based on grounds other than authenticity (e.g., relevance, hearsay, lack of first-hand knowledge, etc.).

I hereby affirm under penalty of perjury under the laws of the United States that these objections are made in good faith.

Respectfully submitted,



Mark A. Berman, Esq.

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Dated: May 17, 2024